UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In Re Timothy Raymond Sullivan and Rona Myers Sullivan, Debtors.	Case No. 16-34299-KRH Chapter 13

NOTICE OF MOTION

Bank of America, N.A., its assignees and/or successors in interest, has filed papers with the court to move the Court for relief from the automatic stay.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief sought in the motion, or if you want the Court to consider your views on the motion, then on or before fourteen (14) days from the date of service of this motion, you or your attorney must:

☐ File with the Court, at the address shown below, a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H)]. **Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing.** If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. You must also mail a copy to the persons listed below.

☐ Attend the hearing scheduled to be held on **MAY 31, 2017** at **11:00am** in United States Bankruptcy Court, Judge Kevin R. Huennekens's Courtroom 5000, 701 East Broad Street, Richmond, VA 23219. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**

☐ A copy of any written response must be mailed to the following persons:

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street, Ste 4000
Richmond, VA 23219-1888

Steven L. Higgs, Esq. (22720)
Steven L. Higgs, P.C.
9 Franklin Road, S.W.
Roanoke, VA 24011-2403
(540) 400-7990
Counsel for Movant

Steven L. Higgs
Steven L. Higgs, P.C.
9 Franklin Road, S.W.
Roanoke, VA 24011-2403

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

/s/ Steven L. Higgs
Steven L. Higgs, Esq. (VSB 22720)
Steven L. Higgs, P.C.
9 Franklin Road, S.W.
Roanoke, VA 24011-2403
(540) 400-7990
Virginia State Bar No. 22720
Retained Counsel for Movant

Certificate of Service

I hereby certify that on May 15, 2017, a true copy of this Notice of Motion was mailed or electronically served to:

Timothy Raymond Sullivan
Rona Myers Sullivan
1754 Mill Creek Road
Wake, VA 23176

Charles H. Krumbein, Esquire
Krumbein Consumer Legal Services, Inc.
1650 Willow Lawn Dr.
Suite 300
Richmond, VA 23230

Carl M. Bates
P.O Box 1819
Richmond, VA 23218

/s/ Steven L. Higgs